

UNITED STATES DISTRICT COURTS
EASTERN DISTRICT OF TEXAS
Lufkin DIVISION

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TEXAS-EASTERN
BY OH

Jaworski Adkins

(Name of plaintiff or plaintiffs)

MISC NO. _____

CIVIL ACTION NO. 9:02CV148

VS

Helmerich+Payne
Drilling

Hannah

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 2000e-5 (g).
2. Plaintiff, Jaworski Adkins, is a citizen of the United States and resides at 303 Cooper Apt 1, Lindale, Smith, TX, 75771, 903-882-0347.
(name of plaintiff) (street address) (city) (county) (state) (ZIP) (telephone)
3. Defendant, Helmerich+Payne Drilling, lives at, or its business is located at UTICA # 21st, Tulsa, OK, 74114, 1-800-382-0114.
(name of defendant) (street address) (city) (county) (state) (ZIP) (telephone)
4. Plaintiff sought employment from the defendant or was employed by the defendant at CR 945, Bitter Trawick, Nacadoches, TX.
(street address) (city) (county) (state) (ZIP)

5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 9 and 10 of the complaint on or about 9-6-00 - 10-18-01
(day)
June 2001
(month) (year)

6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraphs 9 and 10 of this complaint on or about 19th
(day)
Jan 2002
(month) (year)

7. The Equal Employment Commission issued a Notice of Right to Sue which was received by plaintiff on or about March 27th 2002
(day) (month) (year)

8. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) _____ sex,
(4) _____ religion, (5) _____ national origin, defendant:

(a) _____ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment. twice

(c) ☒ failed to promote plaintiff.

(d) I was also subject to a
hostile environment and demoted

9. The circumstances under which the defendant discriminated against plaintiff were as follows: stating ~~at~~ that the word nigger
meant black! Firing me when son was in
hospital. ~~Displaying~~ Displaying hangman's noose
on work site. Firing me again when I
had permission to take off work because
my boss hit my truck with his truck!

10. The acts set forth in paragraph 9 of this complaint:

- (a) _____ are still being committed by defendant.
- (b) ✓ are no longer being committed by defendant.
- (c) _____ may still be being committed by defendant.

11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint. WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) _____ Defendant be directed to employ plaintiff, and
- (b) ✓ Defendant be directed to re-employ plaintiff, and
- (c) ✓ Defendant be directed to promote plaintiff, and
- (d) ✓ Defendant be directed to pay and that the Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.


(SIGNATURE OF PLAINTIFF)